

CASE NO. 25-11929-AA

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IN THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT

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ALEXANDER CARTWRIGHT, MICHAEL JOHNSON,  
NANCY MYERS, AND TOSHA DUPRAS,  
Defendants/Appellants,

v.

CHARLES NEGY,  
Plaintiff/Appellee.

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ON APPEAL FROM THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
District Court Case No. 6:23-CV-00666-CEM-DCI

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APPELLANTS' UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO FILE THEIR PRINCIPAL BRIF

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**CERTIFICATE OF INTERESTED PERSONS AND  
CORPORATE DISCLOSURE STATEMENT**

Pursuant to 11th Cir. R. 26.1-1(a), Defendants/Appellants Alexander Cartwright, Michael Johnson, Tosha Dupras, and Nancy Myers provide the following list of all trial judges, attorneys, persons, associations of persons, firms, partnerships, or corporations that have an interest in the outcome of this case or appeal, and other identifiable legal entities related to a party. There are no subsidiaries, conglomerates, affiliates, parent corporations, or any publicly held corporation that own 10% or more of a party's stock as there are no corporate parties to this action.

1. Allen Harris Law—Attorneys for Plaintiff/Appellee;
2. Barry, Richard L.—Attorney for Defendants/Appellants;
3. Butler, S. Kent—Defendant;
4. Cartwright, Alexander—Defendant/Appellant;
5. Dupras, Tosha—Defendant/Appellant;
6. Engel, Joshua A.—Attorney for Plaintiff/Appellee;
7. Engel & Martin, LLC—Attorneys for Plaintiff/Appellee;
8. Goldstein Law Partners, LLC—Attorneys for Plaintiff/Appellee;
9. GrayRobinson, P.A.—Attorneys for Defendants/Appellants;
10. Harris, Samantha—Attorney for Plaintiff/Appellee;
11. Hatcher-Bolin, Kristie—Attorney for Defendants/Appellants;

12. Irick, Daniel C. – United States Magistrate Judge, Middle District of Florida, Orlando Division;
13. Johnson, Michael—Defendant/Appellant;
14. Katz, Katherine W.—Attorney for Defendants/Appellants;
15. Lauten, Jr., Frederick James—Mediator;
16. Mendoza, Carlos E.—United States District Judge, Middle District of Florida, Orlando Division;
17. Myers, Nancy—Defendant/Appellant;
18. Negy, Charles—Plaintiff/Appellee;
19. Osborne, David R.—Attorney for Plaintiff/Appellee;
20. Spradley, Susan T.—Former Attorney for Defendants/Appellants;
21. The University of Central Florida Board of Trustees—Defendant;
22. Zimmerman, Jason—Former Attorney for Defendants/Appellants;
23. Zolty, Julie M.—Attorney for Defendants/Appellants.

**APPELLANTS' UNOPPOSED MOTION**  
**FOR EXTENSION OF TIME TO FILE PRINCIPAL BRIEF**

Appellants Alexander Cartwright, Tosha Dupras, Michael Johnson, and Nancy Myers, pursuant to 11th Cir. R. 31-2, respectfully request that the Court enter an order extending the time to file their principal brief by an additional 14 days, through and including Wednesday, September 3, 2025, and in support state:

1. Appellants' principal brief is currently due Wednesday, August 20, 2025, based upon one prior telephonic extension of 30 days granted by the Clerk.
2. Counsel for Appellants respectfully request a 14-day extension of time to complete and file their principal brief due to recent medical treatments that have impacted one of their attorneys, Kristie Hatcher-Bolin, as well as multiple appellate and trial deadlines counsel of record have, as set forth below, including but not limited to:
  - (a) preparation of the answer brief in *Cody Gabriel v. The Seminole Tribe of Florida*, Case No. 25-11508 (11th Cir.) (due August 27, 2025);
  - (b) preparation of the response brief to the Amended Petition for Certiorari in *Dina Goldstein v. Town of Surfside*, Case No. 2025-000035-AP-1 (Eleventh Judicial Circuit) (due August 18, 2025);
  - (c) preparation of briefing on Motion to Dismiss in *Austin Alexander v. Orlando Slingshot*, Case No. 2025-CA-002311-O (Ninth Judicial Circuit) (due August 29, 2025);

(d) preparation of briefing on Motion to Dismiss in *Reyes v. The Florida Agricultural and Mechanical University Board of Trustees*, Case No. 2025-CA-001279-O (Ninth Judicial Circuit) (due August 25, 2025);

(e) preparation for and attendance at deposition of Plaintiff Melissa Ann Middleton in *Middleton v. Midwestern Construction, Inc.*, Case No. 2023-CA-003164 (Thirteenth Judicial Circuit) (occurring August 8, 2025);

(f) preparation of amended pretrial statement and updated witness and exhibit lists in *McClellon v. GM Expedite, et al*, Case No. 3:21-cv-993-TJC-MCR (USDC Middle District of Florida, Jacksonville Division) (due August 19, 2025);

(g) preparation for and attendance at Court-ordered mediation in *Janis Stafford v. Planet Hollywood (Orlando), LLC*, Case No. 2024-CA-002766-O (Ninth Judicial Circuit) (occurring August 12, 2025);

(h) preparation for and attendance at deposition of client James S. Kaufmann in *Lisvey Bravo & Medelo Gonzalez v. Citizens Property Insurance Corporation*, Case No. 24-CC-009407 (Thirteenth Judicial Circuit) (occurring August 14, 2025);

(i) preparation for and attendance at Final Pre-Trial Meeting in *McClellon v. GM Expedite, et al*, Case No. 3:21-cv-993-TJC-MCR (USDC Middle District of Florida, Jacksonville Division) (occurring August 15, 2025);

- (j) preparation of Motions in Limine in *McClellon v. GM Expedite, et al*, Case No. 3:21-cv-993-TJC-MCR (USDC Middle District of Florida, Jacksonville Division) (due August 19, 2025);
- (k) preparation for and attendance at deposition of Meghan Veronica Kennedy in *Victoria Katherine Davis v. Bravo Brio Restaurants, LLC*, Case No. 2024-CA-008557-O (Ninth Judicial Circuit) (occurring August 20, 2025);
- (l) preparation for and attendance at Case Management Conference in *Houda Safar v. SCI Funeral Services of Florida, LLC.*, Case No. 16-2025-CA-002299-AXXX-MA (Fourth Judicial Circuit) (occurring August 22, 2025);
- (m) preparation and exchange of trial witness lists and exhibit lists in *Peter and Cathie Clarke v. Walter Pavon, et al.* (Case No. 2024-CA-00506-O) (due August 11, 2025);
- (n) preparation for and attendance at deposition of expert witness John Smith, P.E. in *Elmer Bailey v. Broward County, et al.*, Case No. 2022-001407 (Seventeenth Judicial Circuit) (occurring August 13, 2025); and
- (o) preparation for and attendance at hearing on Motion for Summary Judgment in *Peter and Cathie Clarke v. Walter Pavon, et al.* (Case No. 2024-CA-00506-O) (occurring August 11, 2025).

3. Additionally, Attorney Kristie Hatcher-Bolin, who has been Appellants' counsel since the outset of the District Court case and is overseeing the

briefing for Appellants, is currently undergoing treatment for a significant medical condition, which has impacted her ability to timely review, revise, and finalize drafts for Appellants' review before filing.

4. This extension is sought in good faith and not to improperly delay this proceeding.

5. Granting this request will not prejudice any party, and the undersigned has contacted counsel for Appellee, Charles Negy, who responded that they do not object to the 14-day extension requested in this motion.

WHEREFORE, Appellants respectfully request that the Court enter an order extending the time for Appellants to file their principal brief by 14 days, through and including Wednesday, September 3, 2025.

**CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMIT,  
TYPEFACE REQUIREMENTS, AND TYPE-STYLE REQUIREMENTS**

1. This document complies with the type-volume limit of Fed. R. App. P. 27(d)(2)(A) because, excluding the parts of the document exempted by Fed. R. App. P. 32(f): this document contains 701 words.

2. This document complies with the typeface and style requirements of Fed. R. App. P. 27(d)(1)(E) because: this document has been prepared in a proportionally spaced typeface in 14-point Times New Roman font.

*/s/ Kristie Hatcher-Bolin*  
KRISTIE HATCHER-BOLIN  
Florida Bar No. 521388

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion was filed with the Clerk of Court using the CM/ECF system this 7<sup>th</sup> day of August, 2025, which will serve a copy on all counsel of record listed below:

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